

Aaron D. Neal

From: Robert Friedman <robert@guptawessler.com>
Sent: Thursday, January 2, 2025 6:42 PM
To: Elliott Engel
Cc: Aaron D. Neal; Steven.Potter@baltimorecity.gov; Lee Ogburn
Subject: Re: ECO v. Baltimore

Based on your representation that you would like to consult with Steven before filing and as a courtesy to him, we will agree to extend the deadline for everyone so long as you express in your motion that counsel is experiencing a family emergency. We would like the court to understand that we are consenting for that reason, not because we think time is not of the essence. Additionally, we ask that you extend the courtesy back by filing as soon as practicable and not waiting until 7th just because you may have the additional time.

On Thu, Jan 2, 2025 at 5:12 PM Elliott Engel <ee@bbelaw.com> wrote:

Robert,

To clarify, Aaron and I would also like an extension until Tuesday.

Please confirm.

Thank you,

Elliott

Elliott Engel, Esq.

Partner

P: 667-217-5150 | **E:** ee@bbelaw.com

MD: 1777 Reisterstown Road, Suite 265 | Baltimore, MD 21208

NY: 978 Route 45, Suite 107 | Pomona, New York 10970

bbelaw.com



From: Aaron D. Neal <aneal@mhlawyers.com>
Sent: Thursday, January 2, 2025 5:10 PM
To: Robert Friedman <robert@guptawessler.com>
Cc: Elliott Engel <ee@bbelaw.com>; Steven.Potter@baltimorecity.gov; Lee Ogburn <logburn@mdlab.org>
Subject: Re: ECO v. Baltimore

Im honestly not sure what the plan is at the moment, as we've not been able to confer with Steven in any detail. If you're only willing to grant the extension for Steven, then I suppose Elliott and I will file our own response(s) tomorrow. If you're ok with an extension for all, we may be able to file a single response.

Aaron D. Neal

Sent from my iPhone

On Jan 2, 2025, at 3:49 PM, Robert Friedman <robert@guptawessler.com> wrote:

Hi Aaron - I'm sorry to hear that about Steven, and we can agree to allow him the additional time. I can't tell, however, if you are asking for extra time for all three defendants to file three separate briefs or if you are asking for extra time because you all plan to file a single consolidated brief. Would you mind clarifying?

On Thu, Jan 2, 2025 at 3:42 PM Aaron D. Neal <aneal@mhlawyers.com> wrote:

Robert,

I trust that you've seen the court's sua sponte order setting a 1/3 deadline for the defendants to respond to your motion. Steven is dealing with a family emergency at the moment and I'm not sure that he'll be able to coordinate with other defense counsel to get something filed by then. Would you consent to moving the response date out to the originally agreed January 7 deadline? If so, I'll put together a consent motion to that effect.

Regards,

<image001.png>

Aaron D. Neal

Principal

McNamee Hosea, P.A.

6404 Ivy Lane, Suite 820  301.441.2420

Greenbelt, Maryland 20770  301.982.9450

[Facebook](#) | mhlawyers.com

Admitted in Maryland, Virginia, and the District of Columbia

The information contained herein is confidential and intended for the exclusive use of the addressee(s). If you are not the intended recipient, you are hereby notified that any review, use, dissemination, distribution or copying of this message is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and delete the message.

Disclosure Required by IRS Circular 230: In accordance with IRS requirements, we wish to inform you that, to the extent this communication contains tax advice, it is not intended or written to be used for the purpose of 1) avoiding tax penalties that may be imposed on the taxpayer by the Internal Revenue Service, or 2) promoting, marketing or recommending to another party any transaction or matter addressed herein.

From: Robert Friedman <robert@guptawessler.com>

Sent: Wednesday, January 1, 2025 8:42 AM

To: Aaron D. Neal <aneal@mhlawyers.com>

Cc: ee@bbelaw.com; Steven.Potter@baltimorecity.gov; Lee Ogburn <logburn@mdlab.org>

Subject: Re: ECO v. Baltimore

Here you go.

On Tue, Dec 31, 2024 at 9:49 PM Aaron D. Neal <aneal@mhlawyers.com> wrote:

Got it. Can you send a copy of what you just filed? I'm out of town and can't pull docs from CM/ECF on my phone.

Aaron D. Neal

Sent from my iPhone

On Dec 31, 2024, at 9:20 PM, Robert Friedman <robert@guptawessler.com> wrote:

Hi Aaron,

I'm sorry for causing confusion. I understand you are not consenting to us filing one brief. I already filed a motion requesting the court allow us to file one about twenty minutes ago.

My recent email was seeking your consent to file your opposition briefs to tonight's motion by January 7 so we have a chance of getting a quick ruling on whether we can or cannot file a single brief. In other words, we filed one motion tonight: to file a consolidated brief. We are filing a second motion on Thursday: to shorten your time to respond to January 7. I'm asking if you'd consent to the latter (or propose an alternative schedule).

Thanks,

Rob

On Tue, Dec 31, 2024 at 9:15 PM Aaron D. Neal <aneal@mhlawyers.com> wrote:

Hi Rob,

My apologies if I wasn't clear. All three defense counsel discussed and we do not consent to plaintiffs' briefing proposal. I think we'd all prefer to reply to individual responses directed solely at the arguments that were raised in our respective motions.

I don't want to speak for everyone else, but I'm ok if you need some more time to file your response or whatever briefing modification motion you see fit to file. No need to work on the holiday.

Cheers,

Aaron D. Neal

Sent from my iPhone

On Dec 31, 2024, at 9:03 PM, Robert Friedman
<robert@guptawessler.com> wrote:

Hi Aaron, Elliot, and Steven,

I wanted to clarify my prior email. It was addressed to Aaron because he had responded to me, but we are seeking everyone's consent (or alternative proposals). We plan to file the motion to shorten the time at 3pm on Thursday if you are able to please get back to us before then.

Thanks very much and, once more, happy new year,

Rob

On Tue, Dec 31, 2024 at 3:12 PM Robert Friedman
<robert@guptawessler.com> wrote:

Hi Aaron,

Thank you for getting back to me. We are going to file a motion on Thursday. We also intend to ask the Court to shorten your time to respond so that your opposition is due five days later on the 7th. Can you please let us know if you consent to that or, if not, if you are amenable to a different shortened schedule? We are open to a different due date if it can be worked out on consent, though we'd like to maintain a realistic possibility of getting an order two weeks before our brief is due.

Hope everyone has a happy new year,

Rob

On Mon, Dec 30, 2024 at 2:54 PM Aaron D. Neal
<aneal@mhlawyers.com> wrote:

Good afternoon Rob,

Steven, Elliott and I have discussed your proposal and we do not consent.

Regards,

<image001.png>

Aaron D. Neal
Principal

McNamee Hosea, P.A.
6404 Ivy Lane, Suite 820 **O** 301.441.2420
Greenbelt, Maryland 20770 **F** 301.982.9450

[Facebook](#) | mhlawyers.com

Admitted in Maryland, Virginia, and the District of Columbia

The information contained herein is confidential and intended for the exclusive use of the addressee(s). If you are not the intended recipient, you are hereby notified that any review, use, dissemination, distribution or copying of this message is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and delete the message.
Disclosure Required by IRS Circular 230: In accordance with IRS requirements, we wish to inform you that, to the extent this communication contains tax advice, it is not intended or written to be used for the purpose of 1) avoiding tax penalties that may be imposed on the taxpayer by the Internal Revenue Service, or 2) promoting, marketing or recommending to another party any transaction or matter addressed herein.

From: Robert Friedman <robert@guptawessler.com>
Sent: Thursday, December 26, 2024 10:21 AM
To: Aaron D. Neal <aneal@mhlawyers.com>; ee@bbelaw.com; steven.potter@baltimorecity.gov
Cc: Ogburn, Lee <logburn@mdlab.org>
Subject: ECO v. Baltimore

Hi Aaron, Elliott, and Steven,

I hope you all are having a nice end of the year.

I'm writing about the plaintiffs' opposition briefs due in response to the motions filed by Tempest, ECTA, and the City of Baltimore. Rather than file three responses of up to 90 total pages, we'd like to ask the court for leave to file one consolidated

response of up to 60 pages. Could you please let us know if you'd consent?

Thanks very much,

Rob

--

Robert D. Friedman
Gupta Wessler LLP

2001 K Street, NW, Suite 850

Washington, DC 20006

914.588.4713

This email has been scanned for spam and viruses. Click [here](#) to report this email as spam.

--

Robert D. Friedman
Gupta Wessler LLP

2001 K Street, NW, Suite 850

Washington, DC 20006

914.588.4713

--

Robert D. Friedman
Gupta Wessler LLP

2001 K Street, NW, Suite 850

Washington, DC 20006

914.588.4713

This email has been scanned for spam and viruses. Click [here](#) to report this email as spam.

--

Robert D. Friedman
Gupta Wessler LLP

2001 K Street, NW, Suite 850

Washington, DC 20006

914.588.4713

This email has been scanned for spam and viruses. Click [here](#) to report this email as spam.

--

Robert D. Friedman
Gupta Wessler LLP

2001 K Street, NW, Suite 850

Washington, DC 20006

914.588.4713

--

Robert D. Friedman
Gupta Wessler LLP

2001 K Street, NW, Suite 850

Washington, DC 20006

914.588.4713

This email has been scanned for spam and viruses. Click [here](#) to report this email as spam.

--

Robert D. Friedman
Gupta Wessler LLP
2001 K Street, NW, Suite 850
Washington, DC 20006
914.588.4713

This email has been scanned for spam and viruses. Click [here](#) to report this email as spam.